

Rule Radiophone Service, Inc.  
2232 Dell Range Boulevard  
Cheyenne, WY 82009-4994  
(307) 637-7777

February 29, 2008

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

VIA Electronic Filing

Re: Certification of CPNI Filing  
EB Docket No. 06-36  
FRN: 0003-7688-01

Dear Ms. Dortch:

Transmitted electronically, in accordance with the Commission's Public Notice, DA 08-171, released January 29, 2008, and Section 64.2009(e) of the Commission's Rules, is the certificate of compliance and statement for the year which ended on December 31, 2007 from Rule Radiophone Service, Inc.

Yours truly,

***Robert R. Rule***

Robert R. Rule, owner  
RULE COMMUNICATIONS

## CERTIFICATION

I, Robert R. Rule, hereby certify this is the 29<sup>th</sup> day of February, 2008 that I am the President of Rule Radiophone Service, Inc., and that I have first-hand personal knowledge that Rule Radiophone Service, Inc., has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules which are set forth in 47 C.F.R. ss 64.2009(e).

***Robert R. Rule***

Robert R. Rule, President,  
Rule Radiophone Service, Inc.

## STATEMENT

Rule Radiophone Service, Inc., ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established the required disciplinary procedures should an employee be found to be in violation of the CPNI producers established by Carrier.
- Carrier maintains a record of its affiliates' sales and marketing campaigns that use its customer's CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where their parties were allowed access to CPNI, should this ever happen in the future. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. To date, no such campaigns have been used.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum of one year. Carrier's sales personnel will obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI. But, from a practical view point, Carrier does not use outside marketing efforts, and thus, most of this does not apply.
- "Appropriate authentication of customers where Carrier provides online access to account information" is moot; no account information is on line.
- "Authentication of customers in retail locations" is mostly moot, as we have only one office employee, and she knows all of the customers personally.

Should this change, we will require new employees to check customer IDs.

- “A requirement to establish a password protection when Carrier provides online access to account information is moot, as account information is not posted online.
- Regarding any actions taken against data brokers, including a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI, this is all moot, as none of this has happened.

***Robert R. Rule***

Robert R. Rule, President,  
RULE RADIOPHONE SERVICE, INC.